

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

CERTIFICATION OF COUNSEL

I, Matthew B. McGuire, counsel to the FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On March 27, 2025, the joint liquidators of Three Arrows Capital, Ltd. (the “Joint Liquidators”, and together with the FTX Recovery Trust, the “Parties”) filed an amended proof of claim (the “Amended Proof of Claim”) on behalf of Three Arrows Capital, Ltd. (“3AC”) against FTX Trading Ltd. and its affiliated debtors and debtors-in-possession. The Amended Proof of Claim was assigned claim number 100078 in the above-captioned chapter 11 proceedings before the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. On June 20, 2025, the FTX Recovery Trust filed an objection to the Amended Proof of Claim [D.I. 30932] (the “Objection”) ³.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established through the Debtors’ confirmed Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates (the “Plan”) [D.I. 26404], which became effective on January 3, 2025 [D.I. 29127].

³ Capitalized terms not otherwise defined herein shall have the same meanings ascribed to them in the Stipulation or the Objection, as applicable.

3. On November 25, 2025, the Joint Liquidators filed a response to the Objection [D.I. 33900] (the “Response”).

4. On December 29, 2025, the FTX Recovery Trust filed a reply in support of the Objection [D.I. 34240] (the “Reply”).

5. An evidentiary hearing regarding the Amended Proof of Claim and Objection is scheduled to begin on January 26, 2026.

6. The Parties have conferred in good faith and agreed to select the Honorable Christopher S. Sontchi (Ret.) as the mediator of the Objection to the Amended Proof of Claim (the “Mediation”) as memorialized in the *Stipulation Regarding Appointment of Mediator* (the “Stipulation”). Attached hereto as **Exhibit A** is a proposed order (the “Proposed Order”) approving the Stipulation. Attached as **Exhibit 1** to the Proposed Order is the Stipulation, as agreed to by and among the Parties.

7. In accordance with the Court’s electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

8. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Order at its earliest convenience.

Dated: January 5, 2026
Wilmington, Delaware

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/s/ Matthew B. McGuire

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